| - 1 | | |
|-----|---|---|
| 1 | JONATHAN H. BLAVIN (State Bar No. 230269) | |
| 2 | Jonathan.Blavin@mto.com MUNGER, TOLLES & OLSON LLP | |
| 3 | 560 Mission Street, 27th Floor San Francisco, CA 94105-2907 Telephone: (415) 512-4000 | |
| | | |
| 4 | Facsimile: (415) 512-4007 | |
| 5 | ROSE L. EHLER (State Bar No. 296523) | |
| 6 | Rose.Ehler@mto.com | |
| 7 | MUNGER, TOLLES & OLSON LLP 350 South Grand Avenue, 50th Floor | |
| 8 | Los Angeles, CA 90071-3426 Telephone: (213) 683-9100 | |
| 9 | Facsimile: (213) 687-3702 | |
| 10 | Attorneys for SNAP INC. | |
| 11 | | |
| 12 | UNITED STATES DISTRICT COURT | |
| 13 | NORTHERN DISTRICT OF CALIFORNIA | |
| 14 | | |
| 15 | IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY | MDL No. 3047 |
| 16 | PRODUCTS LIABILITY LITIGATION | CASE NO.: 4:22-md-03047-YGR-PHK |
| 17 | This Document Relates to: | Honorable Yvonne Gonzalez Rogers |
| 18 | | DECLARATION OF JENNIFER BODEN |
| 19 | ALL ACTIONS | IN SUPPORT OF SNAP INC.'S OMNIBUS MOTION TO SEAL (PLAINTIFFS' |
| 20 | | OMNIBUS OPPOSITION BRIEF AND NON-EXHIBIT MATERIALS) |
| | | |
| 21 | | |
| 22 | I, Jennifer Boden, declare and state as follows: | |
| 23 | 1. I am Vice President, People at Snap Inc. ("Snap"). I have worked at Snap for a | |
| 24 | total of more than four years. I make this declaration based on personal knowledge. I submit this | |
| 25 | Declaration in support of Snap's Omnibus Motion to Seal (Plaintiffs' Omnibus Opposition Brief | |
| 26 | and Non-Exhibit Materials). If called as a witness, I could and would testify competently to the | |
| 27 | facts stated herein. | |
| 28 | | |
| | | Case No. 4:22-md-03047-YGR |

DECLARATION OF JENNIFER BODEN IN SUPPORT OF SNAP INC.'S OMNIBUS MOTION TO SEAL (PLAINTIFFS' OMNIBUS OPPOSITION BRIEF AND NON-EXHIBIT MATERIALS)

- 2. Based on my experience, Snap employees whose names become publicly associated with contentious social issues are at heightened risk of harassment, including online threats and suspicious phone calls, text messages, or emails. This risk is substantially greater when an employee is linked to such issues, compared to when the individual is publicly identified only as working at Snap or even as a member of a particular Snap team.
- 3. Once an employee's name is publicly disclosed, individuals intent on causing harm can often locate the employee's home address and personal contact information online. As a result, Snap has, on occasion, been required to implement security measures to protect the safety of its employees and their family members.
- 4. In my experience, the allegations in the complaints in this case—including claims that Snap has harmed the mental health of minors—are the type that could expose Snap employees to harassment or threats if their names were publicly associated with them.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 9th day of December, 2025, at London, England.

